

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

KENNETH JOHNSON and JACQUELYN)	
JOHNSON, as Co-Administrators for and on)	
Behalf of the Estate of Kendrick Lamar Johnson,)	
A Minor,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION
)	NO.: 7:20-cv-00004-HL
BRIAN BELL, ET AL.)	
)	
Defendants.)	

**DEFENDANTS CHRIS PRINE, STRYDE JONES AND LOWNDES COUNTY’S
MOTION TO DISMISS
BY WAY OF SPECIAL APPEARANCE**

COME NOW Defendants Chris Prine (Prine), Stryde Jones (Jones) and Lowndes County (the County) (collectively “these defendants”), by way of special appearance and without waiving and specifically reserving all defenses available to them, and pursuant to Federal Rules of Civil Procedure 12(b) and 4(m) and Local Rule 7.1, file this Motion to Dismiss plaintiffs’ complaint (Doc. 1), showing the Court as follows:

In support of this motion, these defendants rely on the arguments and citations to authority presented in the accompanying memorandum of law filed herewith as well as the memorandum of law (Doc. 9-1) filed by defendants Wesley Taylor and the Lowndes County School District. As shown in those memoranda of law, these defendants’ motion should be granted.

This 29th day of June, 2020.

[signature on following page]

/s/James L. Elliott
State Bar No. 244244
Attorney for Chris Prine, Stryde Jones and
Lowndes County, Georgia

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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing upon all parties to this action by filing the same with the Court's CM/ECF system and/or mailing the same as follows:

CHEVENE B. KING, JR.
POST OFFICE DRAWER 3468
ALBANY, GA 31706

LOYCE WARREN TURNER, JR.
PO BOX157
VALDOSTA, GA 31603

WAYNE S MELNICK
ARASH ALI SABZEVARI
100 GALLERIA PKWY STE 1600
ATLANTA, GA 30339-5948

This 29th day of June, 2020.

/s/ James L. Elliott
James L. Elliott
GA Bar No. 244244